## Case 1:22-cr-00154-ADA-BAM Document 29 Filed 10/04/23 Page 1 of 3

- 1				
1	HEATHER E. WILLIAMS, CA Bar #122664 Federal Defender ERIN SNIDER, CA Bar #304781 Assistant Federal Defender Office of the Federal Defender			
2				
3				
4	2300 Tulare Street, Suite 330 Fresno, CA 93721-2226			
5	Telephone: (559) 487-5561 Fax: (559) 487-5950			
6	Attorneys for Defendant			
7	KENNETH JAY LAITMAN  also known as John Roosevelt Rodman			
8	IN THE UNITED STATES DISTRICT COURT			
9	FOR THE EASTERN DISTRICT OF CALIFORNIA			
10				
11	UNITED STATES OF AMERICA,	Case No. 1:22-cr-00154-ADA-BAM		
12	Plaintiff,	STIPULATION TO CONTINUE STATUS CONFERENCE; ORDER		
13	VS.	Date: December 13, 2023		
14	KENNETH JAY LAITMAN, also known as John Roosevelt Rodman,	Time: 1:00 p.m. Judge: Hon. Barbara A. McAuliffe		
15	Defendant.	Judge. Holl. Darbara A. McAunne		
16	Detendant.			
17	IT IS HEREBY STIPULATED by and between the parties through their respective			
18	counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant			
19	Federal Defender Erin Snider, counsel for Kenneth Jay Laitman, also known as John Roosevelt			
20	Rodman, that the status conference currently scheduled for October 11, 2023, at 1:00 p.m. may			
21	be continued to December 13, 2023, at 1:00 p.m.			
22	The parties agree and request that the Court make the following findings:			
23	1. By previous order, this matter was set for a status conference on July 26, 2023.			
24	2. The government has produc	ed 8,089 bates-marked items in this matter.		
25	3. The government has extended a plea offer.			
26	4. Counsel for the defendant re	equires additional time to review discovery, consult		
27	with her client regarding the case, conduct necessary investigation, and engage in further plea			
28	negotiations.			

## Case 1:22-cr-00154-ADA-BAM Document 29 Filed 10/04/23 Page 2 of 3

1	5.	Counsel for the defendant b	pelieves that failure to grant the above-requested
2	continuance would deny her the reasonable time necessary for effective preparation, taking into		
3	account the exercise of due diligence.		
4	6.	The government does not o	bject to the continuance.
5	7.	Based on the above-stated findings, the ends of justice served by continuing the	
6	case as reques	s requested outweigh the interest of the public and the defendant in a trial within the	
7	original date prescribed by the Speedy Trial Act.		
8	8.	8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,	
9	et seq., within which trial must commence, the time period of October 11, 2023, to December 13,		
10	2023, inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).		
11	IT IS SO STIPULATED.		
12			Respectfully submitted,
13			PHILLIP A. TALBERT
14			United States Attorney
15	Date: October	r 4, 2023	/s/ Joseph Barton
16			Assistant United States Attorney Attorney for Plaintiff
17			Autorney for Framum
18			HEATHER E. WILLIAMS Federal Defender
19			rederal Defender
20	Date: October	r 4, 2023	<u>/s/ Erin Snider</u> ERIN SNIDER
21			Assistant Federal Defender Attorney for Defendant
22			KENNETH JAY LAITMAN, also known as John Roosevelt Rodman
23			John Rooseven Rouman
24	///		
25	///		
26	///		
27	///		
28	///		

## Case 1:22-cr-00154-ADA-BAM Document 29 Filed 10/04/23 Page 3 of 3 **ORDER** IT IS SO ORDERED that the status conference is continued from October 11, 2023, to December 13, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv). IT IS SO ORDERED. 18/ Barbara A. McAuliffe Dated: **October 4, 2023** UNITED STATES MAGISTRATE JUDGE